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Attorney for DEFENDANT SHOLEM KLEIN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ADAM D. WHITE.,

Civ. No.: 1:23-cv-6924

v.

Plaintiff(s),

**VERIFIED ANSWER**

SHOLEM KLEIN, THE CITY OF NEW YOK, NEW YORK  
CITY POLICE DEPARTMENT (“NYPD”) SERGEANT  
LEIGHTON BARRETT, NYPD SERGEANT KURT KLENKE,  
NYPD OFFICER AHMED ALI, NYPD OFFICER PALAKPREET  
KAUR, NYPD OFFICER ADMAM PHILLIPS, NYPD OFFICER  
CARLOS REBOLLEDOCORTES, and NYPD OFFICER IKRAM  
ULLAH,

Defendant(s)  
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**ANSWER AND DEFENSES**

DEFENDANT SHOLEM KLEIN (hereinafter “KLEIN”) as an for his answer to the  
Complaint by and through his attorneys the Law Office of Hector M. Roman P.C., states as  
follows:

1. The DEFENDANT KLEIN is without sufficient knowledge or information so  
as to form a belief as to the truth of the allegations contained in Paragraph 1 of the complaint.
2. The DEFENDANT KLEIN is without sufficient knowledge or information so  
as to form a belief as to the truth of the allegations contained in Paragraph 2 of the complaint.
3. The DEFENDANT KLEIN is without sufficient knowledge or information so  
as to form a belief as to the truth of the allegations contained in Paragraph 3 of the complaint.

4. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 4 of the complaint.

5. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 5 of the complaint.

6. The DEFENDANT KLEIN denies the allegations contained in paragraph 6 of the complaint.

7. The DEFENDANT KLEIN denies the allegations contained in paragraph 7 of the complaint.

8. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 8 of Plaintiff's Complaint.

9. The DEFENDANT KLEIN denies the allegations contained in paragraph 9 of the complaint.

10. The DEFENDANT KLEIN denies the allegations contained in paragraph 10 of the complaint.

11. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 11 of Plaintiff's Complaint.

12. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 12 of Plaintiff's Complaint.

13. The DEFENDANT KLEIN is without sufficient knowledge or information so

as to form a belief as to the truth of the allegations contained in Paragraph 13 of Plaintiff's Complaint.

14. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 14 of Plaintiff's Complaint.

15. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 15 of Plaintiff's Complaint.

16. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 16 of Plaintiff's Complaint.

17. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 17 of Plaintiff's Complaint.

18. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 18 of Plaintiff's Complaint.

19. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 19 of Plaintiff's Complaint.

20. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 20 of Plaintiff's

Complaint.

21. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 21 of Plaintiff's Complaint.

22. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 22 of Plaintiff's Complaint.

23. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 23 of Plaintiff's Complaint.

24. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 24 of Plaintiff's Complaint.

25. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 25 of Plaintiff's Complaint.

26. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 26 of Plaintiff's Complaint.

27. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 27 of Plaintiff's Complaint.

28. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 28 of Plaintiff's Complaint.

29. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 9 of Plaintiff's Complaint.

30. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 30 of Plaintiff's Complaint.

31. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 31 of Plaintiff's Complaint.

32. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 32 of Plaintiff's Complaint.

33. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 33 of Plaintiff's Complaint.

34. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 34 of Plaintiff's Complaint.

35. The DEFENDANT KLEIN is without sufficient knowledge or information so

as to form a belief as to the truth of the allegations contained in Paragraph 35 of Plaintiff's Complaint.

36. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 36 of Plaintiff's Complaint.

37. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 37 of Plaintiff's Complaint.

38. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 38 of Plaintiff's Complaint.

39. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 39 of Plaintiff's Complaint.

40. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 40 of Plaintiff's Complaint.

41. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 41 of Plaintiff's Complaint.

42. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 42 of Plaintiff's

Complaint.

43. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 43 of Plaintiff's Complaint.

44. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 44 of Plaintiff's Complaint.

45. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 45 of Plaintiff's Complaint.

46. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 46 of Plaintiff's Complaint.

47. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 47 of Plaintiff's Complaint.

48. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 48 of Plaintiff's Complaint.

49. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 49 of Plaintiff's Complaint.

50. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 50 of Plaintiff's Complaint.

51. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 51 of Plaintiff's Complaint.

52. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 52 of Plaintiff's Complaint.

53. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 53 of Plaintiff's Complaint.

54. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 54 of Plaintiff's Complaint.

55. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 55 of Plaintiff's Complaint.

56. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 56 of Plaintiff's Complaint.

57. The DEFENDANT KLEIN is without sufficient knowledge or information so



as to form a belief as to the truth of the allegations contained in Paragraph 57 of Plaintiff's Complaint.

58. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 58 of Plaintiff's Complaint.

59. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 59 of Plaintiff's Complaint.

60. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 60 of Plaintiff's Complaint.

61. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 61 of Plaintiff's Complaint.

62. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 62 of Plaintiff's Complaint.

63. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 63 of Plaintiff's Complaint.

64. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 64 of Plaintiff's

Complaint.

65. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 65 of Plaintiff's Complaint.

66. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 66 of Plaintiff's Complaint.

67. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 67 of Plaintiff's Complaint.

68. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 68 of Plaintiff's Complaint.

69. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 69 of Plaintiff's Complaint.

70. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 70 of Plaintiff's Complaint.

71. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 71 of Plaintiff's Complaint.

72. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 72 of Plaintiff's Complaint.

73. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 73 of Plaintiff's Complaint.

74. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 74 of Plaintiff's Complaint.

75. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 75 of Plaintiff's Complaint.

76. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 76 of Plaintiff's Complaint.

77. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 77 of Plaintiff's Complaint.

78. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 78 of Plaintiff's Complaint.

79. The DEFENDANT KLEIN is without sufficient knowledge or information so

as to form a belief as to the truth of the allegations contained in Paragraph 79 of Plaintiff's Complaint.

80. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 80 of Plaintiff's Complaint.

81. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 81 of Plaintiff's Complaint.

82. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 82 of Plaintiff's Complaint.

83. The DEFENDANT KLEIN denies the allegations and premise contained in paragraph 83 of the complaint.

84. The DEFENDANT KLEIN denies the allegations and premise contained in paragraph 84 of the complaint.

85. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 85 of Plaintiff's Complaint.

86. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 86 of Plaintiff's Complaint.

87. The DEFENDANT KLEIN is without sufficient knowledge or information so

as to form a belief as to the truth of the allegations contained in Paragraph 87 of Plaintiff's Complaint.

88. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 88 of Plaintiff's Complaint.

89. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 89 of Plaintiff's Complaint.

90. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 90 of Plaintiff's Complaint.

91. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 91 of Plaintiff's Complaint.

92. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 92 of Plaintiff's Complaint.

93. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 93 of Plaintiff's Complaint.

94. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 94 of Plaintiff's

Complaint.

95. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 95 of Plaintiff's Complaint.

96. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 96 of Plaintiff's Complaint.

97. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 97 of Plaintiff's Complaint.

98. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 98 of Plaintiff's Complaint.

99. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 99 of Plaintiff's Complaint.

100. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 100 of Plaintiff's Complaint.

101. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 101 of Plaintiff's Complaint.

102. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 102 of Plaintiff's Complaint.

103. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 103 of Plaintiff's Complaint.

104. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 104 of Plaintiff's Complaint.

105. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 105 of Plaintiff's Complaint.

106. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 106 of Plaintiff's Complaint.

107. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 107 of Plaintiff's Complaint.

108. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 108 of Plaintiff's Complaint.

109. The DEFENDANT KLEIN is without sufficient knowledge or information so

as to form a belief as to the truth of the allegations contained in Paragraph 109 of Plaintiff's Complaint.

110. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 110 of Plaintiff's Complaint.

111. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 111 of Plaintiff's Complaint.

112. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 112 of Plaintiff's Complaint.

113. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 113 of Plaintiff's Complaint.

114. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 114 of Plaintiff's Complaint.

115. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 115 of Plaintiff's Complaint.

116. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 116 of Plaintiff's



Complaint.

117. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 117 of Plaintiff's Complaint.

118. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 118 of Plaintiff's Complaint.

119. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 119 of Plaintiff's Complaint.

120. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 120 of Plaintiff's Complaint.

121. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 121 of Plaintiff's Complaint.

122. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 122 of Plaintiff's Complaint.

123. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 123 of Plaintiff's Complaint.

124. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 124 of Plaintiff's Complaint.

125. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 125 of Plaintiff's Complaint.

126. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 126 of Plaintiff's Complaint.

127. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 127 of Plaintiff's Complaint.

128. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 128 of Plaintiff's Complaint.

129. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 129 of Plaintiff's Complaint.

130. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 130 of Plaintiff's Complaint.

131. The DEFENDANT KLEIN is without sufficient knowledge or information so

as to form a belief as to the truth of the allegations contained in Paragraph 131 of Plaintiff's Complaint.

132. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 132 of Plaintiff's Complaint.

133. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 133 of Plaintiff's Complaint.

134. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 134 of Plaintiff's Complaint.

135. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 135 of Plaintiff's Complaint.

136. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 136 of Plaintiff's Complaint.

137. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 137 of Plaintiff's Complaint.

138. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 138 of Plaintiff's

Complaint.

139. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 139 of Plaintiff's Complaint.

140. The DEFENDANT KLEIN denies the allegations contained in paragraph 140 of the complaint.

141. The DEFENDANT KLEIN denies the allegations contained in paragraph 141 of the complaint.

142. The DEFENDANT KLEIN denies the allegations contained in paragraph 142 of the complaint.

143. The DEFENDANT KLEIN denies the allegations contained in paragraph 143 of the complaint.

144. The DEFENDANT KLEIN denies the allegations contained in paragraph 144 of the complaint.

145. The DEFENDANT KLEIN denies the allegations contained in paragraph 145 of the complaint.

146. The DEFENDANT KLEIN denies the allegations contained in paragraph 146 of the complaint.

147. The DEFENDANT KLEIN denies the allegations contained in paragraph 147 of the complaint.

148. The DEFENDANT KLEIN denies the allegations contained in paragraph 148 of the complaint.

149. The DEFENDANT KLEIN denies the allegations contained in paragraph 149 of the complaint.

150. The DEFENDANT KLEIN denies the allegations contained in paragraph 150 of the complaint.

**AS AND FOR A RESPONSE TO THE FIRST CLAIM FOR RELIEF**

151. The DEFENDANT KLEIN denies the allegations contained in paragraph 151 of the complaint.

152. The DEFENDANT KLEIN denies the allegations contained in paragraph 152 of the complaint.

153. The DEFENDANT KLEIN denies the allegations contained in paragraph 153 of the complaint.

154. The DEFENDANT KLEIN denies the allegations contained in paragraph 154 of the complaint.

155. The DEFENDANT KLEIN denies the allegations contained in paragraph 155 of the complaint.

156. The DEFENDANT KLEIN denies the allegations contained in paragraph 156 of the complaint.

157. The DEFENDANT KLEIN denies the allegations contained in paragraph 157 of the complaint.

**AS AND FOR A RESPONSE TO THE SECOND CLAIM FOR RELIEF**

158. The DEFENDANT KLEIN denies the allegations contained in paragraph 158 of the complaint.

159. The DEFENDANT KLEIN denies the allegations contained in paragraph 159 of the complaint.

160. The DEFENDANT KLEIN denies the allegations contained in paragraph 160 of the complaint.

161. The DEFENDANT KLEIN denies the allegations contained in paragraph 161 of the complaint.

162. The DEFENDANT KLEIN denies the allegations contained in paragraph 162 of the complaint.

163. The DEFENDANT KLEIN denies the allegations contained in paragraph 163 of the complaint.

164. The DEFENDANT KLEIN denies the allegations contained in paragraph 164 of the complaint.

165. The DEFENDANT KLEIN denies the allegations contained in paragraph 165 of the complaint.

**AS AND FOR A RESPONSE TO THE THIRD CLAIM FOR RELIEF**

166. The DEFENDANT KLEIN denies the allegations contained in paragraph 166 of the complaint.

167. The DEFENDANT KLEIN denies the allegations contained in paragraph 167 of the complaint.

168. The DEFENDANT KLEIN denies the allegations contained in paragraph 168 of the complaint.

169. The DEFENDANT KLEIN denies the allegations contained in paragraph 169

of the complaint.

**AS AND FOR A RESPONSE TO THE FOURTH CLAIM FOR RELIEF**

170. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 170 of Plaintiff's Complaint.

171. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 171 of Plaintiff's Complaint.

172. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 172 of Plaintiff's Complaint.

173. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 173 of Plaintiff's Complaint.

174. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 174 of Plaintiff's Complaint.

175. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 175 of Plaintiff's Complaint.

176. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 176 of Plaintiff's

Complaint.

177. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 177 of Plaintiff's Complaint.

**AS AND FOR A RESPONSE TO THE FIFTH CLAIM FOR RELIEF**

178. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 178 of Plaintiff's Complaint.

179. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 179 of Plaintiff's Complaint.

180. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 180 of Plaintiff's Complaint.

181. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 181 of Plaintiff's Complaint.

182. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 182 of Plaintiff's Complaint.

183. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 183 of Plaintiff's



Complaint.

184. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 184 of Plaintiff's Complaint.

**AS AND FOR A RESPONSE TO THE SIXTH CLAIM FOR RELIEF**

185. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 185 of Plaintiff's Complaint.

186. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 186 of Plaintiff's Complaint.

187. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 187 of Plaintiff's Complaint.

188. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 188 of Plaintiff's Complaint.

189. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 189 of Plaintiff's Complaint.

190. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 190 of Plaintiff's

Complaint.

191. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 191 of Plaintiff's Complaint.

**AS AND FOR A RESPONSE TO THE SEVENTH CLAIM FOR RELIEF**

192. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 192 of Plaintiff's Complaint.

193. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 193 of Plaintiff's Complaint.

194. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 194 of Plaintiff's Complaint.

195. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 195 of Plaintiff's Complaint.

196. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 196 of Plaintiff's Complaint.

197. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 197 of Plaintiff's

Complaint.

198. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 198 of Plaintiff's Complaint.

199. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 199 of Plaintiff's Complaint.

200. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 200 of Plaintiff's Complaint.

201. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 201 of Plaintiff's Complaint.

202. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 202 of Plaintiff's Complaint.

203. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 203 of Plaintiff's Complaint.

204. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 204 of Plaintiff's Complaint.

205. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 205 of Plaintiff's Complaint.

206. The DEFENDANT KLEIN is without sufficient knowledge or information so as to form a belief as to the truth of the allegations contained in Paragraph 206 of Plaintiff's Complaint.

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### **AFFIRMATIVE AND OTHER DEFENSES**

DEFENDANT KLEIN assert the following affirmative and other defenses. In asserting those defenses, KLEIN does not assume the burden of proof with respect to any issue as to which applicable law places the burden of proof upon plaintiffs.

#### **FIRST AFFIRMATIVE DEFENSE**

The Complaint fails to state a claim upon which relief can be granted against Defendant Klein.

#### **SECOND AFFIRMATIVE DEFENSE**

The Plaintiff's First cause of action against Defendant Klein fails specify the acts or omissions by Defendant Klein to support its allegations.

#### **THIRD AFFIRMATIVE DEFENSE**

The Defendant Klein was harrassed by the Plaintiff.

#### **FOURTH AFFIRMATIVE DEFENSE**

The Defendant Klein suffered vandalism by Plaintiff's conduct.

#### **FIFTH AFFIRMATIVE DEFENSE**

The Plaintiff engaged in disorderly conduct as and for against the Defendant Klein.

**SIXTH AFFIRMATIVE DEFENSE**

The Defendant Klein was assaulted by the Plaintiff.

**SEVENTH AFFIRMATIVE DEFENSE**

Plaintiff's claims are barred by the doctrine of unclean hands.

**EIGHTH AFFIRMATIVE DEFENSE**

The Plaintiff engaged in menacing conduct as and for against the Defendant Klein.

**NINTH AFFIRMATIVE DEFENSE**

Defendant Klein's conduct was neither, malicious, willful, oppressive, and/or reckless. At all times relevant hereto, the answering defendant did not act in a negligent, reckless, or careless manner or in violation of any statute or applicable law.

**TENTH AFFIRMATIVE DEFENSE**

Failure to mitigate damages. The claims made in the Complaint are barred, in whole or in part, because of a failure to mitigate damages, if such damages exist.

**ELEVENTH AFFIRMATIVE DEFENSE**

Any amount of damages otherwise recoverable by the plaintiff shall be diminished in total, or in proportion to which such culpable conduct of the plaintiff bears to the total conduct causing the damages alleged in the Verified Complaint.

**TWELFTH AFFIRMATIVE DEFENSE**

The alleged damages, if any, sustained by plaintiff were caused in whole or in part by the conduct of plaintiff or third-parties, over whom the answering defendant had no control.

**THIRTEENTH AFFIRMATIVE DEFENSE**

Plaintiff has failed to allege that any act or omission by the answering defendant was the proximate cause of any damage.

**FOURTEENTH AFFIRMATIVE DEFENSE**

Plaintiff has failed to allege actual or ascertainable damages.

**FIFTEENTH AFFIRMATIVE DEFENSE**

Without any admission by the answering defendant that plaintiff suffered injury, to the extent that plaintiff did suffer a purported injury, the answering defendants state that this action is barred in whole or in part because plaintiff failed to use reasonable means to prevent the alleged damage and failed to use reasonable means to mitigate damages.

**SIXTEENTH AFFIRMATIVE DEFENSE**

Defendant Klein reserves his right to add any additional defenses.

**CROSS-CLAIMS**  
**AGAINST ALL CO-DEFENDANTS**

Defendant Klein incorporates by references the pleadings set forth in all preceding and following paragraphs as if fully set forth herein.

**AS AND FOR A FIRST CROSS-CLAIM AGAINST CO-DEFENDANTS**

That if the plaintiffs were caused to sustain injuries and/or damages at the time and place set forth in plaintiffs' complaint, through any negligence, carelessness and recklessness other than said plaintiffs' or its agents own negligence, carelessness and recklessness, said injuries and/or damages were sustained by reason of the negligence, carelessness and recklessness of the plaintiffs or its agents and if there is any recovery obtained by the plaintiffs against the defendant Klein, it will be damaged thereby; and plaintiffs will be primarily responsible therefore.

**AS AND FOR A SECOND SECOND CROSS-CLAIM**

That any injuries and damages sustained by the plaintiff herein as a result of the alleged incident described in the plaintiff's complaint were sustained in whole or in part by reason of the negligence or other breach of duty on the part of the co-defendants.

That if it is determined that the Defendant Klein is liable to any degree to the plaintiff, whether because of negligence, by operation of law or any other reason, the Defendant, Klein is entitled to have the liability apportioned among and between the defendants by way of contribution and/or is entitled to be indemnified by one or more of said co-defendants.

**AS AND FOR A THIRD CROSS-CLAIM AGAINST CO-DEFENDANTS**

In the event that the Defendant Klein is held liable for all or any part of the damages alleged to have been sustained by the plaintiffs as set forth in the plaintiffs' complaint, or any cross-claims, which liability is expressly denied, such liability will have been brought about and caused solely as a result of the fault, negligence, acts or omissions, want of care and/or breach of contract on the part of co-defendants, without any fault, negligence or want of care on the part of Defendant Klein contributing thereto, the co-defendants will be obligated to indemnify Defendant Klein, for common-law indemnification and/or contract law, where applicable, herein against such loss or damages as it may suffer, including without limitation any judgment entered against Defendant Klein, and all costs disbursements, expenses and attorney's fees incurred in the defense of this action, as provided by applicable law.

By reason of the foregoing, the plaintiffs will be liable to the Defendant, Klein, in whole or in part for any such recovery against the said co-defendants.



**WHEREFORE**, DEFENDANT KLEIN demand that the Plaintiff's Complaint be dismissed in its entirety with prejudice, granting the cross-claims against co-defendants, awarding costs, disbursements and reasonable counsel fees, and granting such other and further relief as this Court deems just and proper.

Dated: Richmond Hill, New York

October 17, 2023

Law Office of Hector M. Roman, P.C.

Hector M. Roman, Esq

By: *Hector Roman*  
Hector M. Roman (HR3196)  
Attorneys for DEFENDANT KLEIN  
108-14 Jamaica Ave  
Richmond Hill, NY 11418  
Tel: 718.533.8444  
Fax: 718.732.2151  
Email: [hroman@roman-law.org](mailto:hroman@roman-law.org)

To:

Gideon Orion Oliver  
277 Broadway, Suite 1501  
New York, NY 10007

COHEN&GREEN PLLC  
1639 Centre Street, Suite 216  
Ridgewood, NY 11385  
T. 929.888.9460  
F. 929.888.9457  
[remy@femmelaw.com](mailto:remy@femmelaw.com)

THE CITY OF NEW YORK  
C/O NEW YORK CITY LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

NEW YORK CITY POLICE DEPARTMENT (“NYPD”) SERGEANT LEIGHTON  
BARRETT  
78th Precinct Community Affairs  
65 6th Avenue  
Brooklyn, NY, 11217-2110

NYPD SERGEANT KURT KLENKE  
78TH PRECINCT  
65 6th Avenue  
Brooklyn, NY, 11217-2110

NYPD OFFICER AHMED ALI  
PBBS SPECIALIZED UNITS  
c/o 397 Coney Island Ave  
Brooklyn, NY 11218

NYPD OFFICER PALAKPREET KAUR  
78TH PRECINCT  
65 6th Avenue  
Brooklyn, NY, 11217-2110

NYPD OFFICER ADAM PHILLIPS  
78TH PRECINCT  
65 6th Avenue  
Brooklyn, NY, 11217-2110

NYPD OFFICER CARLOS REBOLLEDOCORTES  
78TH PRECINCT  
65 6th Avenue  
Brooklyn, NY, 11217-2110

NYPD OFFICER IKRAM ULLAH  
78TH PRECINCT  
65 6th Avenue  
Brooklyn, NY, 11217-2110

## AFFIDAVIT OF SERVICE

STATE OF NEW YORK    )  
                                      )  
COUNTY OF QUEENS    )       ss.:

Babli Mehta, being duly sworn, deposes and says:

I am not a party to the action. I am over 18 years of age and reside in Queens County, New York.

On October 18, 202, I served the within VERIFIED ANSWER WITH CROSS-CLAIMS by depositing a true copy thereof, enclosed in a post paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New York, via regular mail addressed to each of the following persons at the last known address set forth after each name:

To:

Gideon Orion Oliver  
277 Broadway, Suite 1501  
New York, NY 10007

COHEN&GREEN PLLC  
1639 Centre Street, Suite 216  
RIDGEWOOD, NY 11385

THE CITY OF NEW YORK  
C/O NEW YORK CITY LAW DEPARTMENT  
100 CHURCH STREET NEW YORK, NY 10007

NYPD SERGEANT LEIGHTON BARRETT  
78th Precinct Community Affairs  
65 6th Avenue Brooklyn, NY, 11217-2110

NYPD SERGEANT KURT KLENKE  
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65 6th Avenue Brooklyn, NY, 11217-2110

NYPD OFFICER AHMED ALIPBBS  
SPECIALIZED UNITS c/o  
397 Coney Island Ave Brooklyn, NY 11218

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65 6th Avenue Brooklyn, NY, 11217-2110

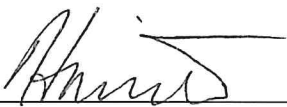
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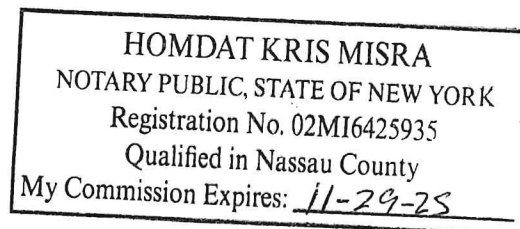
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78TH PRECINCT  
65 6th Avenue Brooklyn, NY, 11217-2110

NYPD OFFICER IKRAM ULLAH  
78TH PRECINCT  
65 6th Avenue Brooklyn, NY, 11217-2110

Babli Mehta  
Babli Mehta

Sworn to before me this  
18 day of October, 2023

  
Notary Public



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Civ. No.: 1:23-cv-6924

---

ADAM D. WHITE.,

v.

Plaintiff(s),

SHOLEM KLEIN, THE CITY OF NEW YOK, NEW YORK  
CITY POLICE DEPARTMENT (“NYPD”) SERGEANT  
LEIGHTON BARRETT, NYPD SERGEANT KURT KLENKE,  
NYPD OFFICER AHMED ALI, NYPD OFFICER PALAKPREET  
KAUR, NYPD OFFICER ADMAM PHILLIPS, NYPD OFFICER  
CARLOS REBOLLEDOCORTES, and NYPD OFFICER IKRAM  
ULLAH,

Defendant(s)

---

**VERIFIED ANSWER WITH CROSS-CLAIMS**

---

Law Office of Hector M. Roman, P.C.  
Attorneys for Defendant Sholem Klein  
108-14 Jamaica Avenue  
Richmond Hill, New York 11418  
(718) 533-8444  
Fax No.: (718) 732-2151

---

To: Signature (Rule 130-1.1-a)

Attorneys for

*Hector Roman*

Hector M. Roman

Service of a copy of the within is hereby admitted

Dated:10/17/2023